

Presentment Date: January 5, 2022 at 12:00 p.m.
Objection Date: December 29, 2021 at 5:00 p.m.
Hearing Date and Time: To be scheduled if an Objection is Filed

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
FIRESTAR DIAMOND, INC., <i>et al.</i> ,	:	Case No. 18-10509 (SHL)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
-----	X	
RICHARD LEVIN, Chapter 11 Trustee of	:	
FIRESTAR DIAMOND, INC., FANTASY, INC.,	:	
and OLD AJ, INC. f/k/a/ A. JAFFE, INC.,	:	
	:	
Plaintiff,	:	
	:	Adv. Proc. No. 19-1102 (SHL)
v .	:	
	:	
NIRAV DEEPAK MODI, MIHIR BHANSALI, and	:	
AJAY GANDHI,	:	
	:	
Defendants.	:	
-----	X	
RICHARD LEVIN, Chapter 11 Trustee of	:	
FIRESTAR DIAMOND, INC., FANTASY, INC.,	:	
and OLD AJ, INC. f/k/a/ A. JAFFE, INC.,	:	
	:	
Plaintiff,	:	
	:	Adv. Proc. No. 20-1052 (SHL)
v .	:	
	:	
MIHIR BHANSALI and AJAY GANDHI,	:	
	:	
Defendants.	:	
-----	X	

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Firestar Diamond, Inc. (2729), Fantasy, Inc. (1673), and Old AJ, Inc. f/k/a A. Jaffe, Inc. (4756).

**NOTICE OF PRESENTMENT OF
STIPULATION AND PROPOSED ORDER RE SUBSTITUTION OF COUNSEL**

PLEASE TAKE NOTICE that the undersigned counsel will present the attached Stipulation and Proposed Order of Substitution of Counsel (the “Stipulation and Proposed Order”) to the Honorable Sean H. Lane, United States Bankruptcy Judge, Courtroom 701, at the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), One Bowling Green, New York, New York 10004 on **January 5, 2022 at 12:00 p.m.** (Prevailing Eastern Time).

Objections, if any, to approval of the Stipulation and Proposed Order must: (i) be made in writing; (ii) state with particularity the grounds therefor; (iii) be filed with the Bankruptcy Court (with a copy to the Judge’s chambers); and (iv) be served upon (a) counsel to the United States Trustee for Region 2, 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Richard Morrissey, Esq.); (b) proposed counsel to Ajay Gandhi, Montgomery McCracken Walker & Rhoads LLP, 437 Madison Avenue, Floor 24, New York, New York 10022 (Attn: Edward L. Schnitzer) and Marc J. Phillips, Montgomery McCracken Walker & Rhoads LLP, 1105 North Market Street, 15th Floor, Wilmington, DE 19801; and (c) withdrawing counsel to Ajay Gandhi, Serpe LLC, 16 Madison Square West, 10th Floor, New York, New York 10010 (Attn: Silvia L. Serpe) so as to be received by each of them no later than **December 29, 2021 at 5:00 p.m.** (Prevailing Eastern Time) (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Stipulation and Proposed Order is served and filed with the Clerk of the Court so as to be received by the Objection Deadline, there will not be a hearing and the Stipulation and Proposed Order may be signed. If a written objection is timely served and filed, a hearing (the “Hearing”) will be held to consider the Stipulation and Proposed Order at a date and time to be determined before the

Honorable Sean H. Lane, United States Bankruptcy Judge, at the United States Bankruptcy Court, Courtroom 701, One Bowling Green, New York, New York 10004. Objecting parties are required to attend the Hearing and failure to appear may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that if the Bankruptcy Court determines to hold a hearing on the Stipulation and Proposed Order, parties wishing to telephonically appear or attend any such hearing must make arrangements through CourtSolutions at www.Court-Solutions.com. Additional instructions for registering with CourtSolutions may be found at <http://www.nysb.uscourts.gov/sites/default/files/m543.pdf>.

Dated: December 22, 2021
New York, New York

Montgomery McCracken Walker & Rhoads LLP

By: /s/ Edward L. Schnitzer

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Proposed Counsel to Defendant Ajay Gandhi